## **Statement Regarding iBasis CPNI Compliance Activities**

In order to ensure that the Company is in compliance with the requirements set forth in Section 64.2002 et. Sec. of the Commission's rules (the "Rules"), the Company has taken the following actions:

# **Communication of Rules to Management**

The Legal Department held numerous meetings with managers within the Company to provide an overview and understanding of the rules.

#### **Policies and Procedures Development and Documentation**

As a result of the management meetings a policy and procedures document was developed that reflects the alignment of the business policies and practices with the legal requirements of the Rules. This document addresses the specific rules relating to issues such as:

- Access to CPNI and CDRs online and phone requests
  - Authentication process requirements
  - Issues re: account changes and passwords
- Recording and maintaining information
  - Tracking of CPNI requests
  - Breach Notification Forms and Process
- Customer and agency notification issues
- Marketing practices and privacy policies

## **Employee Responsibilities**

Specific employees were identified to take responsibility for various aspects of the process to ensure ongoing compliance with the Rules, including processing CPNI requests, recording and maintaining records, notification, oversight, legal questions, etc.

### **Employee Training**

Various training sessions with affected employees and customer service representatives were held to go over the rules and the policy and procedure document. The policy and procedures document is posted on the Company's intranet for access by current and future employees.